

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Kimberly J. Brink,	:	Bankruptcy No. 23-21577-CMB
	:	
Debtor.	:	
	:	
<hr/>	:	Chapter 13
Kimberly J. Brink,	:	
	:	Document No.:
Movant,	:	
	:	Related Document No.:
v.	:	
	:	Hearing Date and Time:
No Respondent,	:	January 9, 2024, at 1:30 p.m.
	:	
Respondent.	:	

DEBTOR'S APPLICATION TO EMPLOY SPECIAL COUNSEL NUNC PRO TUNC

AND NOW comes the Debtor, by and through her undersigned counsel, Brian C. Thompson, Esquire, Thompson Law Group, P.C., and files this Application for Employment of Special Counsel Nunc Pro Tunc, representing as follows:

1. Debtor filed for protection under Chapter 13 of the Bankruptcy Code on July 26, 2023.
2. Debtor has marital issues that have resulted in her needing to divorce her currently estranged husband.
3. At this time, Kimberly J. Brink believes that it is in her best interest to hire special counsel to handle this divorce.
4. In order to deal with his divorce, the services of experienced legal counsel are necessary to pursue, litigate, negotiate or otherwise bring about a final resolution in this matter.
5. Debtor respectfully requests that this Court approve the employment of John T. Haller, Jr., Esquire and the law office of Haller & Imbarlina, LLC to serve as special counsel to handle this matter.
6. John T. Haller, Jr., Esquire, Esquire and the law office of Haller & Imbarlina, LLC are experienced in these types of matters has been engaged in this matter since it's inception.
7. Debtor wishes to have John T. Haller, Jr., Esquire, Esquire and the law office of Haller & Imbarlina, LLC handle this matter, and has signed a standard fee

agreement is attached as Exhibit A. Mr. Haller has an hourly rate of \$300.00, which is fully described in the attached agreement.

8. Debtor believes that the assistance of special counsel is necessary and critical to the successful resolution of this divorce proceeding.
9. Debtor's counsel believe that the fee arrangement is reasonable.
10. John T. Haller, Jr., Esquire, Esquire and the law office of Haller & Imbarlina, LLC, has no connection with the Debtor's creditors, nor any party in interest, their respective attorneys and accountants, nor the United States Trustee, nor any person employed in the office of the United States Trustee.

WHEREFORE, Debtor respectfully requests that John T. Haller, Jr., Esquire, Esquire and the law office of Haller & Imbarlina, LLC be authorized to represent Debtor in this divorce proceeding, under the terms indicated in this Application, and such other relief as is just.

Respectfully submitted:

Executed on: November 15, 2023

/s/Brian C. Thompson
Brian C. Thompson, Esquire
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